

To: stillots@nd.gov[stillots@nd.gov]; Scott Kluska[skluska@cteh.com]; Peronard, Paul[Peronard.Paul@epa.gov]
Cc: Roberts, Kris D.[kroberts@nd.gov]; rithompson@mt.gov[rithompson@mt.gov]
From: Bohrer, Mark F.
Sent: Wed 8/13/2014 9:47:18 PM
Subject: RE: Red River Supply - Water Disposal

Gentlemen:

The Oil and Gas Division permits treating plants and saltwater disposal wells in ND for treatment and disposal of oilfield waste. Saltwater disposal wells are only authorized to accept Class II wastes which are defined as uniquely associated with oil and gas exploration and production. The disposal of non-oilfield waste is not allowed down a Class II disposal well. Treating plants permitted by the Commission are authorized to treat tank bottoms, waste oils, drilling mud, waste from drilling operations, produced water, and other wastes related to crude oil and natural gas exploration and production.

The waste from Red River Supply clearly does not meet these definitions. Acceptance of this waste by a treating plant or saltwater disposal well could put their permit in jeopardy and also result in civil or criminal penalties.

Mark Bohrer

UIC Manager/Petroleum Engineer

NDIC-Oil and Gas Division

600 East Blvd-Dept 405

Bismarck ND 58505-0405

Phone: (701) 328-8020

Web Site: <https://www.dmr.nd.gov/oilgas>

From: Tillotson, Steve J.
Sent: Wednesday, August 13, 2014 3:43 PM
To: Scott Kluska; Peronard.Paul@EPA.Gov
Cc: Roberts, Kris D.; Bohrer, Mark F.; Thompson, Ricknold
Subject: RE: Red River Supply - Water Disposal

RE cleanup of water from Red River Supply fire:

I believe the Treatment plant is regulated by the Division of Oil and Gas

I do not see a problem with disposal of the solids in the manner characterized; however, If you need to contact someone in Montana - check with

Ricknold Thompson

Solid Waste Management Section

1520 E. 6th Ave.

P.O. Box 200901

Helena, MT 59620

(406) 444-5345

rithompson@mt.gov

The Department of Health does not have authority over disposal of liquids down a Class II SWD.
That is also Oil and Gas- check with Mark Bohrer: (701) 328-8023

Steve Tillotson

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Solid Waste Program Manager

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Please Keep North Dakota Clean

From: Scott Kluska [<mailto:skluska@cteh.com>]

Sent: Wednesday, August 13, 2014 1:46 PM

To: Peronard.Paul@EPA.Gov

Cc: Roberts, Kris D.; Tillotson, Steve J.

Subject: Red River Supply - Water Disposal

Gentleman,

Some folks from Flatland Water Solutions / Flatland Disposal Solutions looked at the results of the fire water waste characterization samples and came and collected a couple samples from a few frac tanks yesterday. They took them back to their facility to analyze them. They then came back to us with a proposal to treat the water at their facility in Alexander, ND. Their Treatment Facility Permit # is: 19085 and for the subsequent solids from the separation it would go to Oaks Disposal Landfill / Buckhorn Landfill permit #: 528.

The following is an excerpt from their proposal on how they plan to treat the waste liquids.

***Undetermined concentrates of various frac chemicals such as Breakers, Crosslink's, Gelling Agents and Surfactants all have activating characteristics that cannot be determined with the volume of fluids. With the shear points and coagulation points unknown Flatland will evaluate each load and determine the best process for turbidity, and proper disposal measured against a baseline quality control parameter will then be executed. Processing procedures for the fluids discharged off tankers will go through a shaker, separating fluids back through Optimizer (centrifuge) and the solids into transfer container for certified land fill disposal. The fluids*

released from the optimizer are then sent to a Rotary Drum Filter. The Rotary Drum Filter works to effectively removes solid particles from “dirty” fluids and sludges, producing dewatered dry waste and recirculated clarified water, which is then pumped down the SWD well. The solids (dry waste) is then hauled to certified Land Disposal.

Please let me know if you are ok with this liquid waste going to Flatland Disposal Solutions.

Thanks

Scott Kluska

Sr. Consultant

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